

Saul Ewing

RECEIVED Charles M. Lizza
Phone: (973) 286-6715
NOV 21 2014 Fax: (973) 286-6815
clizza@saul.com
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WILLIAM T. WALSH CLERK www.saul.com

November 20, 2014

VIA FACSIMILE (609) 989-0451

The Honorable Douglas E. Arpert, U.S.M.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Helsinn Healthcare S.A., et. al. v. Dr. Reddy's Laboratories, Ltd., et al.
Civil Action No. 11-3962 (MLC)(DEA)

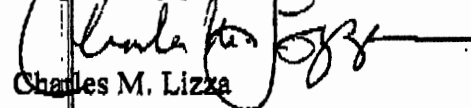
Dear Judge Arpert:

This firm, together with Paul Hastings LLP and Loeb & Loeb LLP, represents Plaintiffs Helsinn Healthcare S.A. and Roche Palo Alto LLC ("Plaintiffs") in the above-captioned matter.

Following on the November 14, 2014 conference call with Your Honor, enclosed is a proposed amended case schedule to which the parties have agreed. Also, as directed during the teleconference, the parties conferred regarding dates for a final pretrial conference, and we have confirmed with Charmaine that all parties and Your Honor are available for a final pretrial conference on April 8, 2015 at 10:30 a.m. This date is also included in the proposed schedule. If this meets with the Your Honor's approval, we respectfully request that you sign the below form of endorsement and enter the schedule on the docket.

Thank you for Your Honor's kind attention to this matter.

Respectfully yours,


Charles M. Lizza

cc: All Counsel (via e-mail)

SO ORDERED on this 21st day of NOVEMBER, 2014.


Hon. Douglas E. Arpert, U.S.M.J.

One Riverfront Plaza, Suite 1520 • Newark, NJ 07102-3426 • Phone: (973) 286-6700 • Fax: (973) 286-6800

Helsinn, et al. v. Dr. Reddy's Labs. et al. (D.N.J.)
Proposed Consolidated 11-3962 / 13-5815 Schedule

Event	Current Schedule	Proposed Schedule
Close of expert discovery	November 26, 2014	January 7, 2015
Exchange list of legal issues	December 3, 2014	January 14, 2015
Exchange fact witness lists (aside from those witnesses called for impeachment purposes, only the witnesses set forth may testify at trial)	December 8, 2014	January 21, 2015
Exchange expert witness lists (no expert shall be permitted to testify at trial unless identified at this time)	December 8, 2014	January 21, 2015
Exchange objections to fact and expert witness lists	December 22, 2014	February 4, 2015
Exchange exhibit lists	January 9, 2015	February 25, 2015
Exchange electronic collection of exhibits from parties' respective exhibit lists in a mutually acceptable format	January 9, 2015	March 3, 2015
Exchange objections to the opposing party's exhibit list	January 30, 2015	March 18, 2015
Exchange affirmative deposition designations	December 22, 2015	February 4, 2015
Exchange deposition counter-designations and objections to affirmative designations	January 23, 2015	February 25, 2015
Exchange objections to counter designations	February 6, 2015	March 11, 2015
Exchange stipulation of facts for the issues on which the parties have the burden of proof	December 22, 2014	February 4, 2015
Exchange responses to stipulation of facts	January 16, 2015	March 3, 2015
Exchange contested facts	February 3, 2015	March 20, 2015
Exchange lists of the parties' contemplated motions <i>in limine</i>	December 12, 2014	January 23, 2015
Meet and confer in an attempt to reach mutual resolutions regarding the parties' contemplated motions <i>in limine</i>	December 19, 2015	January 30, 2015
Serve opening motions <i>in limine</i>	January 16, 2015	February 27, 2015
Serve responses to motions <i>in limine</i>	February 6, 2015	March 20, 2015
Plaintiffs serve draft Pretrial Order text	February 13, 2015	March 11, 2015
Defendants serve rebuttal to Plaintiff's draft Pretrial Order text	February 20, 2015	March 18, 2015
Proposed Final Pretrial Order Due	February 27, 2015	March 25, 2015

Helsinn, et al. v. Dr. Reddy's Labs. et al. (D.N.J.)
Proposed Consolidated 11-3962 / 13-5815 Schedule

Event	Current Schedule	Proposed Schedule
Final Pretrial Conference	Subject to Court's availability; consistent with a requested April 2015 trial date	April 8, 2015 at 10:30 a.m.
Trial Briefs and Proposed Findings of Facts and Conclusions of Law	One week after Final Pretrial Conference	Two weeks before trial
Trial	Subject to Court's availability; parties have requested an April 2015 trial date	Subject to Court's availability; consistent with an April/May 2015 trial date

The Court shall conduct a telephone status conference on **January 5, 2015 at 2:00 p.m.** Plaintiffs' shall initiate the call. If the parties agree that there are no issues to bring before the Court, they shall so advise the Court, and the conference shall be canceled.